

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input checked="" type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 12/12/2016	NEED RESPONSE BY: 12/30/2016
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Stanislaus Co.	
3. PHONE NO.:	7. SUBJECT: BDA for HH members entering a Pending HH for CW/CF	
4. REGULATION CITE(S): ACL 12-25, 12-25E, 14-57 and ACIN 58-13	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):
 A 10/08/2016 CW/CF application, at the time of application the household consisted of Mom and unborn only. Case still pending, Mom calls on 10/16/2016 to report that her 15 year old daughter moved back home and the unborn was born, both taking place on 10/15/2016. All verifications for both children were received by the case manager on 10/16/2016. What are the BDA's for this household?

10. REQUESTOR'S PROPOSED ANSWER:
 BDA for mom is 10/08/2016 and the BDA for the 15yr old and the New born should be 10/16/2016, as that was the date they were reported in the home and all verifications received. This is also how our automated system (C-IV) is programed, if you enter the information as the customer reports it and don't manipulate the data, these are the results you get.
 We don't think the clarifications made in ACL 12-25E and ACIN- 58-13 were the intent of the state. If we follow these clarifications we are aiding individuals before they entered a household. Please clarify if aiding household members before they enter a household was the states intention.

11. STATE POLICY RESPONSE (CFPB USE ONLY):
 Yes, the clarifications made in ACL 12-25E and ACIN 58-13 are correct. In the above scenario, the household changes were reported by mom with verifications before the determination was made. The BDA will be the date of application. Per MPP 63-300.4 the eligibility worker shall explore and consider any changes in the household's circumstances before making the determination.

FOR CDSS USE

DATE RECEIVED: 03/2017	DATE RESPONDED TO COUNTY/ALJ: SV 03/24/2017
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